

resolute
Forest Products

5300 Cureton Ferry Road Post Office Box 7 Catawba, SC 29704-0007

FED EX NO. 7728 0188 5924

July 24, 2018

Manager Air Toxics Section SCDHEC Bureau of Air Quality 2600 Bull Street Columbia SC 29201-1708

Re: MACT II Excess Emissions and Monitoring System Performance Reports

Air Permit No. TV-2440-0005

Dear Manager, Air Toxics:

The purpose of this submittal is to meet the quarterly excess emission reporting requirements applicable to the Resolute Forest Products – Catawba Mill associated with the National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry (40 CFR 63, Subpart MM). The sources covered under Subpart MM are the No. 2 Recovery Boiler, No. 3 Recovery Boiler, No. 2 and No. 3 Smelt Dissolving Tank Vent, and the No. 2 Lime Kiln. This submittal meets the requirements of the Excess Emissions and Continuous Monitoring System (CMS) Performance Report pursuant to Sections 63.867(c) and 63.10(c), respectively.

Excess emissions and CMS downtime for the reporting period were less than 1% and 5% respectively for all systems. Therefore, only the summary reports are attached as allowed in §63.10(e)(3)(vii.

For SSM purposes when an emission has occurred, specific information about the type and duration is reported on the enclosed log(s). All SSM events were consistent with the SSM Plan.

Based on information and belief formed after reasonable inquiry, I certify to the best of my knowledge, that the statements and information in this submission are true, accurate, and complete.

If you have any questions or require additional information, please contact Mike Swanson, environmental engineer at (803) 981-8010 or mike.swanson@resolutefp.com.

Sincerely,

David Clemmons
Interim General Manager

Enclosures: MACT II Logs

cc: SCDHEC – BAQ, Technical Management Section

Alex Latta, Midlands EA Lancaster

EPA Region 4

Environmental File 232.15

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Pollutant:	Opacity
Time Period:	Minutes
Reporting Period:	April 1, 2018 through June 30, 2018
Process Unit Description:	No. 2 Recovery Boiler
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	35%
Monitor Manufacturer(s) and Model Number(s):	Teledyne Monitor Labs / Light Hawk 560 Opacity Monitor
Last CMS Certification or Audit Date:	Certification: October 20, 2006
	Audit: March 16, 2018
Total Source Operating Time in Reporting Period:	122,288 minutes

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration (minutes)	
	Over 35%	Over 20% for 60 minutes
A. Startup/Shutdown	0	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	6	96
Fuel Problems	0	0
Other Known Cause	0	0
Other Unknown Cause	0	0
Total Number of Incidents	1	1
Excess Emissions/Process Operating Time	0.00%	NA

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration (minutes)
Monitor Equipment Malfunctions	144
Non-Monitor Equipment Malfunctions	0
Quality Assurance	0
Other Known Cause	12
Other Unknown Cause	0
Total Number of Incidents	3
Percent Monitor Downtime	0.13 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Name/Title:	David Clemmons	Interim General Manager
Signature:		

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Pollutant:	Opacity
Time Period:	Minutes
Reporting Period:	April 1, 2018 through June 30, 2018
Process Unit Description:	No. 3 Recovery Boiler
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	35%
Monitor Manufacturer(s) and Model Number(s):	Teledyne Monitor Labs / Light Hawk 560 Opacity Monitor
Last CMS Certification or Audit Date:	Certification: July 31, 2010
	Audit: March 16, 2018
Total Source Operating Time in Reporting Period:	115,531 Minutes

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration (minutes)	
	Over 35%	Over 20% for 60 minutes
A. Startup/Shutdown	12	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	0	0
Fuel Problems	0	0
Other Known Cause	0	0
Other Unknown Cause	0	0
Total Number of Incidents	1	0
Excess Emissions/Process Operating Time	0.01 %	NA

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration (minutes)
Monitor Equipment Malfunctions	361
Non-Monitor Equipment Malfunctions	0
Quality Assurance	0
Other Known Cause	0
Other Unknown Cause	0
Total Number of Incidents	3
Percent Monitor Downtime	0.31 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Name/Title:	David Clemmons	Interim General Manager
Signature:		

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Pollutant:	Opacity
Time Period:	Minutes
Reporting Period:	April 1, 2018 through June 30, 2018
Process Unit Description:	No. 2 Lime Kiln
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	20%
Monitor Manufacturer(s) and Model Number(s):	Monitor Labs USI 550 Opacity Monitor
Last CMS Certification or Audit Date:	Certification: October 27, 2012
	Audit: April 30, 2018
Total Source Operating Time in Reporting Period:	116,770 Minutes

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration	(minutes)
	Over 20%	Over 20% for 60 minutes
A. Startup/Shutdown	31	0
B. Malfunctions		
Process/Instrument System	30	0
Control Equipment	0	0
Fuel Problems	0	0
Other Known Cause	0	0
Other Unknown Cause	6	0
Total Number of Incidents	5	0
Excess Emissions/Process Operating Time	0.06 %	NA

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration (minutes)
Monitor Equipment Malfunctions	345
Non-Monitor Equipment Malfunctions	0
Quality Assurance	214
Other Known Cause	0
Other Unknown Cause	0
Total Number of Incidents	9
Percent Monitor Downtime	0.48 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Name/Title:	David Clemmons	Interim General Manager
Signature:		

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Pollutant:	Particulate Matter	
Time Period:	Hours	
Reporting Period:	April 1, 2018 through June 30, 2018	
Process Unit Description:	No. 2 and No. 3 Smelt Dissolving Tank Vent	
Company:	Resolute Forest Products – Catawba Mill	
Emission Limits:	0.2 lbs/ton BLS	
Operating Parameters:	Differential Pressure > 1.5 inches of water column	
	Liquid Flow Rate > 65 gpm	
Monitor Manufacturer(s) and Model Number(s):	DP – Rosemount 3051CD2A02A1AM5E55	
	Liquid Flow Rate – Foxboro IMT25PDADB10N-AB	
Last CMS Certification or Audit Date:	Certification: August 3, 2004 (both)	
	Audits: 6/22/17 (DP), 12/13/17 (Flow)	
Total Source Operating Time in Reporting Period:	1,957 hours	

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration (hrs)
A. Startup/Shutdown	0
B. Malfunctions	
Process System	0
Control Equipment	0
Other Known Cause	0
Other Unknown Cause	0
Total Number of Incidents	0
Excess Emissions / Process Operating Time	0.00 %

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration (hrs)
Monitor Equipment Malfunctions	0
Non-Monitor Equipment Malfunctions	0
Quality Assurance	0
Other Known Cause	0
Other Unknown Cause	0
Total Number of Incidents	0
Percent Monitor Downtime	0.00 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Name/Title:	David Clemmons	Interim General Manager
Signature:		